## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO, :

Plaintiff, : C.A. No. 05-565 GMS

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v. : JURY TRIAL DEMANDED

CHRISTOPHER A. COONS,

individually and in his official capacity; GUY H. SAPP, individually and in his official capacity; and NEW CASTLE COUNTY, a municipal corporation,

:

Defendants.

## NOTICE OF DEPOSITION OF PLAINTIFF, TRINIDAD NAVARRO

TO: Jeffrey K. Martin, Esquire Margolis and Edelstien 1509 Gilpin Avenue Wilmington, DE 19806

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their undersigned attorneys will take the deposition of Plaintiff Trinidad Navarro on Tuesday, April 4, 2006 at 1:00 p.m. at the New Castle County Law Department located at the New Castle County Government Center, 87 Reads Way, New Castle, DE 19720. The deposition shall continue thereafter until terminated by counsel for the Defendants. The deposition will be recorded stenographically and/or videographically and/or audiographically, before a Notary Public

or other officer authorized to administer oaths in Delaware, and will be for the purpose of discovery of evidence and for use at trial.

NEW CASTLE COUNTY LAW DEPARTMENT

Michele D. Allen, Assistant County Attorney

(DE Bar I.D. #4359)

Megan Sanfrancesco, First Assistant County Attorney

(DE Bar I.D. #3801)

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And

Jeffre S. Goddess, Esquire (DE Bar I.D. #630)

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P.O. Box 1070

Wilmington, DE 19899-1070

Attorneys for Defendants

DATED: March 14 , 2006

cc: Wilcox & Fetzer

## **CERTIFICATE OF SERVICE**

I, Jeffrey S. Goddess, do hereby certify that on March 14, 2006, I electronically filed the foregoing NOTICE OF DEPOSITION OF PLAINTIFF with the Clerk of the Court using CM/ECF which will send notification of such filing to all registered participants, including:

> Jeffrey K. Martin, Esquire Timothy J. Wilson, Esquire Keri L. Morris, Esquire 1509 Gilpin Avenue Wilmington, DE 19806 Attorneys for Plaintiff

Megan Sanfrancesco, Esquire Judith A. Hildick, Esquire Michele Allen, Esquire New Castle County Law Department 87 Reads Way New Castle, DE 19720 Attorneys for New Castle County

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